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ROBERT HUNTER BIDEN

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15 **WESTERN DIVISION**

16 ROBERT HUNTER BIDEN, an  
17 individual,

18 Plaintiff,

19 vs.

20 PATRICK M. BYRNE, an individual,  
21 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER  
BIDEN'S FURTHER  
SUPPLEMENT TO MOTION FOR  
ENTRY OF DEFAULT JUDGMENT**

Judge: Hon. Stephen V. Wilson

Date: January 12, 2026

Time: 1:30 P.M.

Place: Courtroom 10A

1 Plaintiff Robert Hunter Biden (“Plaintiff”) hereby submits this further  
2 supplement to his Motion for Entry of Default Judgment (“Default Judgment  
3 Motion”), filed on November 18, 2025 (ECF No. 350), to inform the Court and  
4 provide additional details of Defendant Patrick M. Byrne’s (“Defendant”) ongoing  
5 defamatory actions outlined in Plaintiff’s previous Supplement to his Default  
6 Judgment Motion (ECF No. 351), as well as the lies Defendant stated about Plaintiff,  
7 the merits of this lawsuit, the status of this lawsuit, and the evidence submitted herein.  
8 The continued public dissemination of these Defamatory Statements after the Court  
9 stated in its order denying Defendant’s summary judgment that Defendant did not  
10 have a basis for making the Defamatory Statements shows that Defendant will  
11 continue to defame Plaintiff, misrepresent the evidence in this case, including  
12 Defendant’s lack of any valid evidence, and continue to undermine this Court unless  
13 he is punished by the imposition of severe punitive damages as requested in Plaintiff’s  
14 Default Judgment Motion.

15 As Plaintiff previously informed the Court, on December 9, 2025, Defendant  
16 made a social media post on X (formally known as Twitter) saying: “Going live on  
17 Harrison smith@infowars.com to talk about many things including Hunter Biden.”<sup>1</sup>  
18 (ECF No. 351.) Defendant then appeared on both the *Alex Jones Show* and Harrison  
19 Smith’s *War Room LIVE* on December 9, 2025, in which he stated the same  
20 Defamatory Statements at issue in this matter, and on December 10, 2025, Defendant  
21 reposted a one-minute clip of the interview with Alex Jones on X containing such  
22 defamatory statements.<sup>2</sup> (*Id.*) In that interview, Defendant made the following  
23 statements about Plaintiff and this case:

- 24 • “Hunter is suing me for saying this and he denies, in a swirly way, that  
25 this is true” before reiterating the Defamatory Statements.  
26

27 \_\_\_\_\_  
28 <sup>1</sup> <https://x.com/patrickbyrne/status/1998514367181238510?s=46>

<sup>2</sup> <https://x.com/patrickbyrne/status/1998830299262710105?s=46>

- In reference to the voicemail that was designated as “HIGHLY CONFIDENTIAL” pursuant to the Stipulated Protective Order in this case and which Defendant played on the December 9 episode, Defendants says “Hunter is suing me but I don’t know what he is going to do about this tape, because I’ve got a tape that I’m going to—”.
- Defendant falsely states “We’re going to court in March.”
- Defendant admits his malice toward Plaintiff and apparent motivation to defame him: “I never really hated [Plaintiff]– once the Iranians were letting me know that they were making this – that they were being offered this side-deal by the Bidens, ‘Bribe us and we’ll let you keep more nukes.’ I lost any feel that I needed to be kind about Hunter.”
- Defendant lies about his claim that the voicemails were verified by the FBI: “The FBI verified [the tape], they verified the name of the guy, they verified the voices, they verified the voice of the Iranian and the go-between, Hunter’s go-between, and they told me it is somebody related, it is somebody, ugh, a buddy of Hunter Biden’s that he used, it was a Pakistani son of a big minister of something.”
- Defendant lies about his status as a covert agent to apparently give validity to the Defamatory Statements: “As a tier-one intelligence asset ... my word is gold, they don’t need to polygraph me anymore or anything.”
- Defendant tries to bolster his Defamatory Statements: “This was one of those occasions where I not only had the report, I actually have corroborative material, three voicemails, I’ve given you one of the voicemails and you’ll see mentions of South Korea, Pakistan and there’s even a mention of – an opaque reference to something about the ‘other discussions’, it’s a reference to the nuclear discussions but it’s done very opaquely so the Biden’s were offering to take a bribe in return for letting

1 Iran have their money back and another bribe to let them keep more  
2 nukes.”

3 This ongoing defamatory conduct will not stop unless a harsh punitive damages  
4 award is levied against Defendant.

5  
6 Dated: January 9, 2026

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7  
8 By: /s/ Zachary C. Hansen

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